

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

In re:)	
)	Case No. 3:19-bk-1971
CAPSTONE PEDIATRICS, PLLC,)	
)	Chapter 7
Debtor.)	
_____)	

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Rule LBR 2091-1, undersigned counsel hereby moves to withdraw as counsel for America Cares Trust d/b/a CareNation (“**CareNation**”) due to an irreconcilable conflict.

Undersigned counsel has informed CareNation of the conflict and the need for withdrawal, and CareNation has expressed understanding of the situation and the need to promptly obtain new counsel. Undersigned counsel understands that CareNation may be speaking with potential replacement counsel this week but would request 30 days for CareNation to find appropriate replacement counsel.

Respectfully submitted,

s/ John T. Baxter
Shane G. Ramsey (BPRN 35528)
John T. Baxter (BPRN 35405)
NELSON MULLINS RILEY
& SCARBOROUGH, LLP
One Nashville Place, Suite 1100
150 Fourth Avenue, North
Nashville, TN 37219
Phone: (615) 664 – 5300
Shane.ramsey@nelsonmullins.com
John.baxter@nelsonmullins.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 7, 2022, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

/s/ John T. Baxter

John T. Baxter